

October 11, 2022

National FOIA Office
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (2310A)
Washington, DC 20460

Regional Freedom of Information Officer
U.S. EPA, Region 9
75 Hawthorne Street (ORC-1)
San Francisco, CA 94105

Via FOIA Online

Re: Freedom of Information Act Request

Dear Regional FOIA Officer:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, I am requesting the following documents likely held by the U.S. Environmental Protection Agency's Region 9, NPDES Permit Office:

1. All National Pollutant Discharge Elimination System (NPDES) permits related to the Elly, Ellen, and/or Eureka platforms and/or the San Pedro Bay Pipeline in the Beta oil field located in the Pacific Ocean from **1975 to 2007**, including requested by or granted to: SHELL OIL CO., SHELL CALIFORNIA PRODUCTION, INC., SHELL WESTERN E&P INC., CALRESOURCES LLC, AERA ENERGY LLC, PACIFIC ENERGY RESOURCES LTD., RISE ENERGY BETA LLC, SP BETA PROPERTIES LLC, and MEMORIAL PRODUCTION PARTNERS LP.
 - a. According to a summary prepared by the California Coastal Commission, the EPA originally issued General Permit **CAG2800000** for discharges from 22 oil and gas platforms located in federal waters off the coast of Southern California in **February 1982** with an expiration of June 1984.
 - b. Of the 22 platforms, 14 operated under water quality standards set by the 1982 general permit and eight operated under individual NPDES permits that the EPA issued between 1978 and 1993.
 - c. In **1993**, the EPA renewed the individual permit (**CA0110419**) for Platforms Ellen and Elly (also referred to as Beta Unit).
 - d. NPDES Permit **CA0110516** covered Platform Eureka, among others, and was issued or renewed in **December 1983**.
 - e. Facility numbers of interest include: **CAF001147** (Platform Ellen), **CAF001148** (Platform Elly), and **CAF001149** (Platform Eureka).
 - f. Additional NPDES permits of interest may include **CAG280622** (development/production operations) and **CAG280605** (exploratory operations), however, it appears that these two permits were proposed in February 1986 but never issued.
2. All National Pollutant Discharge Elimination System (NPDES) permits related to the Elly, Ellen, and/or Eureka platforms and/or the San Pedro Bay Pipeline in the Beta oil field located in the Pacific Ocean from **2007 to the present**, including requested by or granted to: AMPLIFY ENERGY CO., BETA OFFSHORE, and SAN PEDRO BAY PIPELINE CO.

- a. The EPA reissued NPDES General Permit **CAG2800000** on September 22, 2004, and again on December 20, 2013.
- a. While NPDES General Permit **CAG2800000** issued on December 20, 2013, effective March 1, 2014, is available on the Region 9 webpage, I understand that additional copies of final general permits and other related documents in the administrative record are on file at U.S. EPA Region 9, NPDES Permits Office (WTR-5). These may include the earlier permits that I seek.
- b. I am also interested in any new NPDES permits issued since the February 28, 2019, expiration of the 2013/2014 permit.

Please provide responsive information as it become available on a rolling basis but consistent with the prescribed timelines of the Freedom of Information Act. Please provide the requested records in electronic or paper form, whichever is faster. If this request must be forwarded to a different records custodian, we request that it be so forwarded as soon as possible.

Should you decide to invoke a FOIA exemption or withhold or redact any responsive records or parts thereof, we request that you: (1) identify each such record with specificity and/or date, author, recipient, and parties copied; (2) explain in full the basis for withholding responsive material; and (3) provide all segregable portions of the records for which you are claiming a specific exemption. Please correlate any redactions with specific exemptions under FOIA.

If you determine that portions of certain documents are exempt from production, the remainder of said documents should be produced nonetheless along with explanations justifying each exemption, including the specific FOIA provision justifying the exemption. 5 U.S.C. 552(b).

History Associates agrees to pay all reasonable and standard processing fees that will be assessed in association with this request, up to the amount of \$1,000.00. Should the fees exceed this amount, please call me with an estimate of the total costs in order that specific expenditures beyond \$1,000.00 can be authorized.

Should you have any questions or concerns regarding this request, please contact me at (301) 279-9697 or via email to ksilvi@historyassociates.com.

Thank you for your attention to this request.

Sincerely,



Kimberly Silvi
Senior Historian